

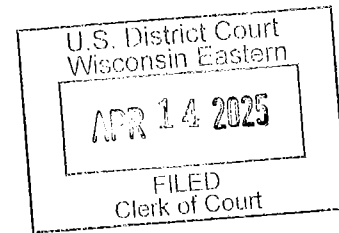
**Calculation of Lost Wage Damages****Assumed Facts:**

The Event occurs January 3 of Year #1

The replacement job begins in August of Year #1

**Variables Used:**

Wages prior to the Event (\$/Yr)	\$59,155
Expected Wage Growth	3%
Work Life Expectancy (Years)	8.0
Duration of Unemployment (Years)	1.0
Replacement Wages	\$59,155
Expected Replacement Wage Growth	3.0%

**Model Calculation**

Added FMLA Front and back pay

	Back Pay (BP)					Future Pay (FP)					
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027
	<u>Year #1</u>	<u>Year #2</u>	<u>Year #3</u>	<u>Year #4</u>	<u>Year #5</u>	<u>Year #6</u>	<u>Year #7</u>	<u>Year #8</u>	<u>Year #9</u>	<u>Year #10</u>	<u>Year #11</u>
Wages 3% increase	\$59,155	\$60,930	\$62,758	\$64,640	\$66,579	\$68,577	\$79,273	\$81,651	84,101	86,624	89,223
Actual Wages	<u>12,003</u>	<u>29,500</u>	<u>31,559</u>	<u>28,263</u>	<u>32,757</u>	<u>45,098</u>	<u>39,528</u>	<u>34,678</u>	<u>31,710</u>	<u>31,710</u>	<u>31,710</u>
Total Lost Wages Year #1-Year#8	47,152	31,430	31,199	36,377	33,822	23,479	39,745	46,973	52,391	54,914	57,513
Lost Employer Benefits Year#1 - Year#8	18,887	18,887	18,887	18,887	18,887	18,887	18,887	18,887	18,887	18,887	18,887

**Retaliation Damages**

Wages back Pay	290,177	
Wages Future pay (FP)	164,818	Replacement of reinstatement
benefits wage loss	151,096	
Emotional distress	300,000	300,000 cap
Defamation of Character	1,000,000	Estimate only no cap, Jury can decide
Outstanding medical bills - child	6,272	
student loan interest	60,000	
Aflac premiums cancer & heart	16,900	
Aflac cancer lump sum payout	200,000	
<u>Aflac heart lump sum payout</u>	<u>60,000</u>	
Total discrimination damages	2,249,263	

**FMLA Damages**

Wages Back Pay	290,177	
Wages Future pay	164,818	Replacement of reinstatement
benefits wage loss	151,096	
Outstanding medical bills - child	6,272	
student loan interest	60,000	
Aflac premiums cancer & heart	16,900	
Aflac cancer lump sum payout	200,000	
<u>Aflac heart lump sum payout</u>	<u>60,000</u>	
liquidated damages	454,995	
<u>Total lost wages &amp; benefits FMLA</u>	<u>949,263</u>	

**Retaliation, & FMLA**

Total wages, benefits and damages	3,198,526
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